

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WISCONSIN**

**In re: Michael & Kim Gross,**

**Chapter 13**

**Debtor(s).**

**07-24520**

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**OBJECTION TO THE MOTION FOR RELIEF  
FROM THE AUTOMATIC STAY BY BAC HOME LOANS**

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NOW COMES Attorney for Debtor(s), Legal Helpers, PC, states and represents that:

- 1 Debtors filed a Chapter 13 Bankruptcy on 6/12/2007.
- 2 BAC Home Loans filed a Motion for Relief from the Automatic Stay, alleging missed payments.
- 3 Debtors have provided certified funds in the amount of \$2,300 in a good faith effort to resolve the motion.
- 4 These funds have been returned to the Debtor to have them re-issued in the name of the proper payee.
- 5 In the event that Debtor is unable to resolve the matter in advance of the hearing, Debtor would ask the Court to order a supplemental claim.

WHEREFORE, Debtor request that the Motion for Relief from the Automatic Stay be denied or in the alternative that a hearing be set in this matter.

By:/s/ William K. Murphy

William K. Murphy #1065481 wkm@legalhelpers.com

Legal Helpers, PC

611 N. Broadway Avenue, #105

Milwaukee, WI 53202

414.270.0700 (f) 414.270.0830

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**NOTICE OF OBJECTION TO THE MOTION FOR RELIEF FROM THE  
AUTOMATIC STAY BY BAC HOME LOANS**

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The Debtor(s), by and through his attorneys, has filed papers with the Court to Object to the Motion for Relief from the Automatic Stay. A Copy of the Objection is attached.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

The attorneys for the debtor(s) have requested a hearing be set by the court in this matter. The notice of the hearing date and time will be sent as soon as it is assigned.

/s/ William K. Murphy

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**CERTIFICATE OF SERVICE**

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The undersigned, an Attorney, does hereby certify that on 7/9/2009 a copy of this Notice and Objection to the Motion for Relief from Stay was served electronically or at their proper post office address after their respective names:

1. Michael & Kim Gross, 2956 N. 91st St., Milwaukee, WI, 53222.
2. Trustee Mary Grossman, Office of the US Trustee, and all other parties that are registered to receive service electronically.

/s/ William K. Murphy

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